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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

Gramercy Distressed Opportunity Fund II, L.P.,
Gramercy Distressed Opportunity Fund III,
L.P., Gramercy Distressed Opportunity Fund
III-A, L.P., Gramercy Funds Management LLC,
Gramercy EM Credit Total Return Fund, and
Roehampton Partners LLC,

Plaintiffs,

vs.

Oleg Bakhmatyuk, Nicholas Piazza, SP Capital
Management, LLC, Oleksandr Yaremenko, and
TNA Corporate Solutions, LLC,

Defendants.

Civil Action No. 0:21-cv-00223-NDF

Complaint Filed: December 7, 2021

Judge: Hon. Nancy D. Freudenthal

**STIPULATED MOTION FOR EXTENSION OF TIME TO RESPOND TO
COMPLAINT**

The parties respectfully move this court for an extension of time to respond to the Complaint and hereby stipulate and state as follows:

1. Plaintiffs filed their Complaint on December 7, 2021.

2. Plaintiffs filed returns of service indicating that Defendants Nicholas Piazza, SP Capital Management LLC, TNA Corporate Solutions LLC and Oleksandr Yaremenko (the “Piazza Defendants”) were served with the Complaint on December 8, 2021.

3. According to the returns of service, the deadline for the Piazza Defendants to file a responsive pleading is December 29, 2021.

4. The Piazza Defendants recently engaged counsel from Winston & Strawn LLP and Holland & Hart LLP.

5. To date, Defendant Oleg Bakhmatyuk has not been served. On or about December 22, 2021, a Request for Service Abroad of Judicial or Extrajudicial Documents on Mr. Bakhmatyuk was sent under the Hague Service Convention.

6. Due to their recent retention, the length of the Complaint and the extensive factual background, which involves multiple parties and spans several years, and the intervening holidays, among other things, the Piazza Defendants’ counsel requested Plaintiffs’ counsel stipulate to additional time for the Piazza Defendants to file a response to the Complaint.

7. As a result of the request, the undersigned parties agree to an extension of the response deadline for the Piazza Defendants that will require a responsive pleading be filed 60 days from the date listed on the returns of service for the Piazza Defendants, with said Defendants agreeing not to contest service of process while reserving all other defenses, including jurisdiction, venue, and forum.

8. The parties agree that the Piazza Defendants shall have until February 7, 2022 to file a response to the Complaint in this action and jointly request an order to this effect.

Dated: December 28, 2021.

/s/ Paula A. Fleck

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of December, 2021, I electronically transmitted the foregoing document to the Clerk of Court of the U.S. District Court, District of Wyoming, using the CM/ECF system for filing. Based on the records currently on file the Clerk of Court will transmit a Notice of Electronic Filing to all registered counsel of record.

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